

Sealed

Public and unofficial staff access
to this instrument are
prohibited by court order.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

United States District Court
Southern District of Texas
FILED

APR 17 2018

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

§

vs.

§

CRIMINAL NO. **B-18-293**

GEORGE Z. RAFIDI

§

SEALED

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

On or about January 10, 2012, in the Southern District of Texas, Defendant,

GEORGE Z. RAFIDI,

knowingly attempted to procure his naturalization as a United States citizen contrary to law, by making a false statement under oath regarding his naturalization application, to wit:

- a. On Part 10, question 8(a) of Defendant RAFIDI's naturalization application (Form N-400), Defendant RAFIDI denied that he had ever been a member of or associated with any organization, association, fund, foundation, party, club, society, or similar group in the United States or in any other place, when in fact, as Defendant RAFIDI then well knew, he was a member of the Popular Front for the Liberation of Palestine organization from 1994 to 1996.
- b. On Part 10, question 9(c) of Defendant RAFIDI's naturalization application (Form N-400), Defendant RAFIDI denied that he had ever been a member of or in any way associated (either directly or indirectly) with a terrorist organization, when in fact, as Defendant RAFIDI then well knew, he was a

member of the Popular Front for the Liberation of Palestine, a terrorist organization, from 1994 to 1996.

- c. On Part 10, question 18 of Defendant RAFIDI's naturalization application (Form N-400), in response to the question "Have you ever been convicted of a crime or offense?", Defendant RAFIDI omitted and failed to disclose that he had been convicted of (1) Membership and activity in an unlawful association, and (2) Activities against Public Order in the Israeli Military Court in Beit El, West Bank.
- d. On Part 10, question 21 of Defendant RAFIDI's naturalization application (Form N-400), in response to the question "Have you **ever** been in jail or prison?", Defendant RAFIDI answered "1 night", when in fact, as Defendant RAFIDI then well knew, he had spent several months in prison following his convictions for (1) Membership and activity in an unlawful association, and (2) Activities against Public Order in the Israeli Military Court in Beit El, West Bank.
- e. On Part 10, question 23 of Defendant RAFIDI's naturalization application (Form N-400), in response to the question "Have you ever given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal?", Defendant RAFIDI answered "No", when in fact, as Defendant RAFIDI then well knew, he had given false and misleading information in his Application to Register Permanent Residence or Adjust Status (Form I-485).

In violation of Title 18, United States Code, Section 1425(a).

COUNT TWO

On or about November 14, 2017, within the Southern District of Texas, defendant,

GEORGE Z. RAFIDI,

did knowingly use and possess an immigrant visa, that is a Permanent Resident Card, which the defendant knew to have been procured by means of a false claim and statement and otherwise unlawfully obtained, in that defendant RAFIDI made a false statement in his Application to Register Permanent Residence or Adjust Status (Form I-485) by omitting and failing to disclose that he had been a member of the Popular Front for the Liberation of Palestine and that he had been arrested, indicted and imprisoned for committing violations of law.

In violation of Title 18, United States Code, Section 1546(a).

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
UNITED STATES ATTORNEY



ISRAEL CANO III
Assistant United States Attorney